

**EXHIBIT C**  
**(Deposition Transcript of Lamont Satchel)**

LAMONT SATCHEL  
CITY OF DETROIT, MICHIGAN

September 19, 2013  
1-4

		Page 1	Page 3
1	IN THE UNITED STATES BANKRUPTCY COURT		
2	EASTERN DISTRICT OF MICHIGAN		
3	SOUTHERN DIVISION		
4			
5	In re	Chapter 9	
6	CITY OF DETROIT, MICHIGAN,	Case No. 13-53846	
7	Debtor.	Hon. Steven W. Rhodes	
8	_____ /		
9			
10	DEONENT: LAMONT SATCHEL		
11	DATE: Thursday, September 19, 2013		
12	TIME: 11:00 a.m.		
13	LOCATION: MILLER CANFIELD PADDOCK & STONE PLC		
14	150 West Jefferson, Suite 2500		
15	Detroit, Michigan		
16	REPORTER: Jeanette M. Fallon, CRR/RMR/CSR-3267		
17			
18			
19			
20			
21			
22			
23			
24			
25			
		Page 2	Page 4
1	APPEARANCES:		
2			
3	JONES DAY		
4	By: Evan Miller		
5	51 Louisiana Avenue, NW		
6	Washington, D.C. 20001.2113		
7	202.879.3939		
8	-and-		
9	MILLER CANFIELD PADDOCK AND STONE PLC		
10	By: Jonathan S. Green		
11	150 West Jefferson, Suite 2500		
12	Detroit, MI 48226.4415		
13	313.496.7997		
14	Appearing on behalf of the Debtor		
15			
16	DENTONS US LLP		
17	By: Anthony B. Ullman		
18	620 Fifth Avenue		
19	New York, NY 10020.2457		
20	212.632.8342		
21	Appearing on behalf of Retirees Committee		
22			
23			
24			
25			



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1	here?	1	Q. So you don't know?
2	A. Not without reading it.	2	A. I don't know.
3	Q. Okay, well, let me just see if I can quickly refresh	3	Q. Okay. Do you know -- is it correct that this is the
4	you. If you look on page 4 under what I have	4	plan that the City was in fact presenting to the
5	suggested to you was the projections as to what would	5	people it met with at the meetings you went to on June
6	happen without restructuring according to the City,	6	20?
7	you'll see there are some line items that are entitled	7	A. Yes, this was the document.
8	pension contributions and there are three subpoints,	8	Q. And do you know whether it changed in any way from the
9	public safety, nonpublic safety and DDOT; do you see	9	terms of the proposals that were set forth in the
10	that?	10	document we referred to earlier as Exhibit C from
11	A. On page 4?	11	Mr. Orr's declaration --
12	Q. On page 4.	12	A. As I stated earlier, I have not read the entirety of
13	A. Uh-huh.	13	that document so I couldn't answer that.
14	Q. Okay, and if you look just for exemplary purposes to	14	Q. So you can't say whether the City's position has
15	the column for year 2014, you see there are entries of	15	changed in any way from June 14th to June 20; can you?
16	139 million, 36.9 million and 23.6 million?	16	A. I cannot at this time, no.
17	A. Uh-huh.	17	Q. And are you aware that another presentation was made
18	Q. And I believe, you can check if you wish, that if you	18	on or around September 11th, 2013 as to what the City
19	add those up, you get 199.5 million that the City,	19	expected to happen under the plan, under its proposal?
20	under the nonrestructuring proposal, would be	20	A. I am not aware.
21	contributing for pension contributions. Do you see	21	MR. MILLER: Object to form.
22	that?	22	A. I was not --
23	A. Uh-huh.	23	Q. Do you know as of September 11th --
24	MR. MILLER: Object to form.	24	A. Can I answer it?
25	Q. Okay. Then if you go to page 5, which I'm suggesting	25	Q. I'm sorry, did I cut you off?
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1	to you is what the City is projecting under its	1	A. Yes.
2	restructuring scenario, what you will see, and you can	2	Q. I didn't mean to.
3	tell me if I'm wrong, is that the only entry for	3	A. I was not aware of that.
4	pension now is sort of a little bit above the middle	4	Q. And as regards pension benefits, which is what we've
5	of the page where it says DC, defined contribution,	5	been looking at, do you know whether the plan, the
6	benefit contribution for the year 2014, we now see the	6	proposal that was presented by the City on September
7	number 25.4 million as opposed to without the	7	11 changed in any way from what it presented first on
8	restructuring 199.5 million. Do you see that?	8	June 14th and then again on June 20th?
9	MR. MILLER: Object to form. The document	9	A. I haven't -- I'm not aware of nor have I seen a
10	speaks for itself.	10	proposal that the City made on September 11.
11	A. I see the number, yeah.	11	Q. So you don't know one way or the another?
12	Q. Okay. And my understanding, you can tell me if this	12	A. I don't.
13	is consistent with yours, is that under the City's	13	Q. Okay, fair enough.
14	proposed restructuring as set forth in document S18	14	Now, is it -- to your knowledge can someone
15	that we've just been looking at, effectively the City	15	or a retiree, for example, look at the information
16	is saying that for retirees they will stop making any	16	that's contained in S18 and be able to figure out
17	pension contributions on a going forward basis and the	17	monetarily what the total impact of this proposal is
18	only pension contributions they're making at all are	18	on that particular individual?
19	for current employees on a -- on the plan set forth	19	A. I don't know.
20	that we've just looked at on page 4, a defined	20	Q. Okay. And you think that's something that someone
21	contribution plan. Is that consistent with your	21	would want to be able to understand in order to
22	understanding?	22	analyze a proposal that's being made and respond
23	MR. MILLER: Object to form.	23	intelligently to it?
24	A. You know, I can't venture any answer with respect to	24	MR. MILLER: Object to form. Calls for
25	these documents because this is not my forte.	25	speculation.

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1 A. Could you rephrase that?		1 anything that's untrue that's stated in here.	
2 MR. ULLMAN: Can you repeat it?		2 A. I have no reason to believe anything in here is	
3 (Record read back as requested.)		3 untrue.	
4 A. What's the that?		4 Q. Okay. And then the follow-up letter that I'm -- and	
5 Q. Being able to understand the monetary impact to the		5 then just before I move to the follow-up letter, this	
6 affected individual of what is being proposed. If I		6 letter is basically saying, is it not, that there's	
7 were presenting you with a proposal, you would want to		7 been a meeting scheduled for June 20 and Mr. Easley is	
8 understand how -- a proposal that purports to affect		8 inviting the recipient to attend; yes?	
9 how much money you're going to get, how many benefits		9 A. It does.	
10 you're going to receive, you would want to know what		10 Q. And that's what led to the June meeting that you	
11 the monetary impact on you is overall in order to		11 talked about before. Now let's go to Exhibit Satchel	
12 think about it, understand it and respond to; true?		12 20, which is a June 17 letter.	
13 A. If it had a monetary impact and --		13 A. Uh-huh, yes.	
14 MR. MILLER: Let me interpose an objection.		14 Q. And just to put the right context on this, if you turn	
15 Object to form.		15 to page 2 of this document, S20, you will see in the	
16 Q. You can answer the question.		16 last paragraph this is from Steven -- is it Kreisberg?	
17 A. If it had a monetary impact and I had an interest in		17 MS. LEVINE: Kreisberg.	
18 that regard, I would. If I didn't, I wouldn't.		18 Q. -- Kreisberg writes to someone at Miller Buckfire --	
19 Q. Okay. Now, we talked about the June 20 meeting. What		19 you know Miller Buckfire was working with the City;	
20 I'm going to do is show you two documents. I'm going		20 right?	
21 to have them marked serially, but I'm going to show		21 A. Yes.	
22 them to you at the same time and then ask you about		22 Q. So in the last paragraph Mr. Kreisberg says, I'm	
23 them because they're related; okay?		23 assisting AFSCME Locals and AFSCME Council 25 with	
24 A. All right.		24 issues relating to the proposal. We've been asked to	
25 MR. ULLMAN: So we're going to mark these		25 meet with the EFM's representatives on Thursday.	
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1 as 19 and 20.		1 Now, Thursday is the 20th; correct? I have	
2 (Marked Exhibit No. 19.)		2 a calendar if you want to check.	
3 (Marked Exhibit No. 20.)		3 A. If you say so.	
4 Q. Now, the first document that I've shown you, which		4 Q. Okay. So that would be the same June 20 meeting and	
5 we've marked as Exhibit 19, is a June 14 letter to Ed		5 Thursday was the same June 20 meeting that we were --	
6 McNeil from Jones Day.		6 you talked about earlier and that's referred to in the	
7 A. Yes.		7 letter we just marked as Satchel 19; correct?	
8 Q. Do you see that? And in fact, you're a copyee on the		8 MR. MILLER: Wait.	
9 Exhibit Satchel 19; do you see that?		9 A. I'm sorry, I was reading the document. Could you say	
10 A. I am.		10 that again?	
11 Q. Do you recognize this letter?		11 Q. I don't remember what I said.	
12 A. I do.		12 MR. ULLMAN: Can you read it back?	
13 Q. Okay. And you actually got a copy at the time it was		13 (Record read back as requested.)	
14 written?		14 A. All right, correct.	
15 A. Did --		15 Q. Okay. Now, if you look at the June 17 letter, Satchel	
16 Q. Okay.		16 20, what Mr. Kreisberg is saying we'd like some	
17 A. I did receive a copy of it.		17 information; right? And he asks for four categories	
18 Q. Okay, and it was written by whom at Jones Day?		18 of information or actually five. There's more on the	
19 Brian Easley?		19 back on the second page; do you see that?	
20 A. It was.		20 MR. MILLER: Object to form.	
21 Q. Do you have any reason to believe anything he said in		21 A. Yes, I see it.	
22 here is untrue, he meaning Mr. Easley?		22 Q. And is it correct that all of this is information that	
23 A. I would have to read it.		23 pertains to issues that may be impacted under the	
24 MR. MILLER: Object to form.		24 proposal that's been put forth by the City?	
25 Q. You can take a look and tell me if you think there's		25 MR. MILLER: Object to form.	

LAMONT SATCHEL  
CITY OF DETROIT, MICHIGAN

September 19, 2013  
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1 State of Michigan)

2 County of Genesee)

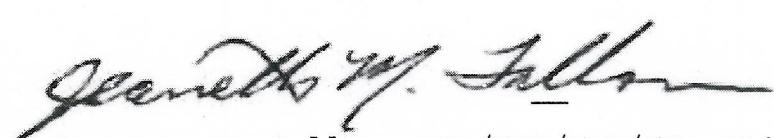
3 Certificate of Notary Public

4 I certify that this transcript is a complete, true and  
5 correct record of the testimony of the witness held in this  
6 case.

7 I also certify that prior to taking this deposition,  
8 the witness was duly sworn or affirmed to tell the truth.

9 I further certify that I am not a relative or an  
10 employee of or an attorney for a party; and that I am not  
11 financially interested, directly or indirectly, in the  
12 matter.

13 WITNESS my hand this 20th day of September,  
14 2013.

15  
16  
17   
18 Jeanette M. Fallon, CRR/RMR/CLR/CSR-3267

19 Certified Realtime Reporter

20 Registered Merit Reporter

21 Certified LiveNote Reporter

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23 Notary Public, Genesee, Michigan

24 Acting in Oakland County, Michigan

25 My Commission Expires: 9-19-18



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